Commonwealth of Kentucky
Division for Air Quality

RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-04-001
Ambrake Manufacturing, Ltd.
300 Ring Road
Elizabethtown, KY 42701
June 15, 2004
Brian Smith, Reviewer
Plant I.D. #: 21-093-00054
Application Log #: 50718

SOURCE DESCRIPTION:

AMBRAKE Manufacturing Ltd. owns and operates a manufacturing facility in Elizabethtown, Kentucky that specializes in the manufacture of automobile brake parts and accessories. The source began construction in 1986 and started operations in 1988. The plant manufactures drum brake assemblies, disc brake assemblies, and brake components for various types of automobile models.

Ambrake produces all the components that make up the disc brake assemblies, including pads, calipers, and supports. Brake pads are produced by using heat and pressure to adjoin raw friction material to metal pressure plates. The friction material is produced in mixing, blending, drying, and performing operations. The metal pressure plates are mechanically punched from sheet steel and phosphate treated. Brake pads are processed in various cutting, grinding, slitting, heat-treating and coating operations before being added to the final brake assemblies along with calipers and supports that have been machined and zinc plated on site.

In the process of manufacturing drum brake assemblies, the drum brake shoe backing plates are punched from sheet steel, welded, drilled, shaved, cleaned, phosphate treated, and coated to meet customer specifications. Then the backing plates are affixed to purchased friction material using adhesive, sent through mechanical grinding operations and then mechanically attached to the final brake assemblies.

Ambrake is a Title V major source due to emissions of hazardous air pollutants and volatile organic compounds. Specifically, Ambrake has the potential to emit greater than 25 tons per year of combined HAPs and greater than 100 tons per year of VOCs. This source is not major under PSD because it is not one of the 28 source categories for which PSD is triggered by potential emissions of 100 tons/year.

PUBLIC AND U.S. EPA REVIEW:

On April 19, 2004, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The News-Enterprise* in Elizabethtown, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Ambrake Manufacturing, Ltd. on May 17, 2004. Attachment A to

this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Ambrake Manufacturing, Ltd.'s Draft Title V Air Quality Permit submitted by J. Trent Browne.

Permit Statement of Basis

1. The manufacturing process described in the first paragraph of the Source Description summarizes only part of the processes in operation at the Ambrake facility. To improve clarity of the overall process description, we recommend that the paragraph be modified to include the following wording:

> AMBRAKE Manufacturing Ltd. owns and operates a manufacturing facility in Elizabethtown, Kentucky that specializes in the manufacture of automobile brake parts and accessories. The source began construction in 1986 and started operations in 1988. The plant manufactures drum brake assemblies, disc brake assemblies, and brake components for various types of automobile models.
>
> Ambrake produces all the components that make up the disc brake assemblies, including pads, calipers, and supports. Brake pads are produced by using heat and pressure to adjoin raw friction material to metal pressure plates. The friction material is produced in mixing, blending, drying, and performing operations. The metal pressure plates are mechanically punched from sheet steel and phosphate treated. Brake pads are processed in various cutting, grinding, slitting, heat-treating and coating operations before being added to the final brake assemblies along with calipers and supports that have been machined and zinc plated on site.
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> In the process of manufacturing drum brake assemblies, the drum brake shoe backing plates are punched from sheet steel, welded, drilled, shaved, cleaned, phosphate treated, and coated to meet customer specifications. Then the backing plates are affixed to purchased friction material using adhesive, sent through mechanical grinding operations and then mechanically attached to the final brake assemblies.

Division's response: The Division concurs with this comment and has revised the Source Description.

2. EP 13: Shoe & Lining Adhesive Ovens
Comment - Several constituents were left out of the listed "Pollutants Emitted" including MEK, Chlorobenzene, MIBK, and Formaldehyde.

Division's response: The Division concurs with this comment and has revised the Statement of Basis.

3. EP 14: Marking and Painting
Comment - When the Potential-to-Emit spreadsheet was sent to DAQ last November 2003, Ambrake had planned to have both Powder Coating Lines on-line, and have phased out the operation of all but one Marking and Painting line. However, due to problems obtaining customer approval, Ambrake has been delayed in these plans. Ambrake currently has one Powder Coating Line and three Marking

and Painting lines in operation and this configuration may last for another 6 months to one year. It is our opinion that the Final Title V Permit needs to reflect the short-term and long-term operations for this area.

The title of this paragraph should read, "EP 14: Marking and Painting #1 - #3". The capacity should be changed from 5,400,000 parts/year (for one line) to 16,200,000 parts/year (three lines).

Division's response: The Division concurs with this comment and has revised the Statement of Basis.

4. EP 18: Small Parts Vapor Degreaser
Comment - The rated capacity should be 3.4 lb/hr, not 1.26 lb/hr. The 3.4 lb/hr is consistent with the 0.4 gallons/hr for EP 18 in Section B. The 1.26 lb/hr that was provided to DAQ as the maximum hourly throughput in the November 13, 2003 spreadsheet was incorrect.

Division's response: The Division concurs with this comment and has revised the Statement of Basis.

5. Insignificant Activities
Comment - The following insignificant activities should be included in the permit. We believe that DAQ should have all the signed DEP 7007D forms for these activities. If not, we would be pleased to resend them.

Vacuum System
Ink Jet Printers (4)
Sand Blaster
Pad Disk Assembly Area
Sealer Machine

Division's response: The Division concurs with this comment and has revised the Statement of Basis.

Draft Permit
6. Section B, Page 2 of 18, No. 5, Specific Recordkeeping Requirements
Comment - Ambrake does not have individual flow meters to each boiler or in the common natural gas line to all three boilers. We are asking for clarification as to the intent of this requirement. In other words, are you asking Ambrake to install meters or can Ambrake track the total plant-wide natural gas usage?

Division's response: The Division believes that keeping track of the total plant-wide natural gas usage will be sufficient. The draft permit has been updated to reflect this.

7. Section B, Page 4 of 18, No. 4, Specific Monitoring Requirements
Comment - As a point of clarification, Ambrake does not maintain hourly and parts production records. Instead, Ambrake can track daily production numbers and can divide these numbers by the hours of operation for that day to arrive at an average "parts/hr". We trust that this will be acceptable to DAQ, but would prefer that the recordkeeping rules be more clearly defined in the permit.

Division's response: The Division concurs with this comment and has revised the draft permit.

8. Section B, Page 7 of 18, Nos. 5 (a and b), Specific Recordkeeping Requirements
Comment - Not all of the requirements in CFR 63.467(a)(1) through (a)(7) and CFR 63.467(b)(1) through (b)(4) apply to Ambrake because of the control combination that was selected to operate the vapor degreaser. To clarify this situation, we are recommending that "records" in both 5a and 5b be changed to "applicable records".

Division's response: The Division concurs with this comment and has revised the draft permit.

9. Section C, Insignificant Activities
Comment - The same Insignificant Activities included in the Permit Statement of Basis should also be included here.

Division's response: The Division concurs with this comment and has revised the draft permit.

10. New Items - VOC Emissions from Coolants

Comment - During the last inspection at Ambrake by DAQ Enforcement Branch on March 4, 2004 the DAQ Inspectors, Mr. Mike Toncray and Jeremy Ray, brought up that the Toyota plant in Georgetown, Kentucky used machining coolants that contained VOCs, and wondered if Ambrake's coolants were similar in nature.

Ambrake reviewed the coolants that are now being used on site and discovered that they are not entirely mineral oil, as originally believed, and that they do contain about 10-12% VOCs (Ethanolamine - CAS No. 141-43-5). To estimate the potential emissions from the operations that use machine coolant, we reviewed the quantity of coolant purchased in 2003, subtracted the amount of used coolant that was sent offsite for treatment, and estimated that the Ambrake plant probably emitted about 14 tons/year of VOCs in 2003 from fugitive emissions from coolants. None of the machines that use these coolants have stacks to the outside. These fugitive emissions are most likely emitted to the outside through the building ventilation systems.

We leave it to DAQ's discretion as to how these fugitive emissions should be addressed in the Final Title V permit.

Division's response: Emission point 20, VOC emissions from coolants, has been added to the draft permit. There are no applicable requirements for this emission point.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.